

a base and a lid attached to the base, the lid having at least one protrusion extending upward from the lid so that when the base is fully inserted within the printhead, the protrusion engages the printhead interior surface and no part of the protrusion, base, or lid engages the camming shoe.

Claim 4 (twice amended). The combination comprising: an ink printer printhead having an interior surface and a camming shoe extending downward from the interior surface, the camming shoe having a pressing means which includes a series of vertically oriented spaced tabs having clear spaces therebetween; and an ink printer cartridge having a base and a lid attached to the base, the lid having at least one protrusion extending upward from the lid so that when the base is fully inserted within the printhead, the protrusion engages the printhead interior surface and no part of the protrusion, base, or lid engages the camming shoe.

REMARKS

It is pointed out with all due respect that the examiner's contention that Amano serves as an anticipatory reference under 35 U.S.C. § 102 is improper for at least the following reasons.

1. Claim 1, as filed, specified that the camming shoe is *extending downward from the interior surface* of the printhead. Even if the examiner is right that the tips of 4 above holes 44 can be a camming shoe, clearly that camming shoe *extends upward* from the interior surface.

It is noteworthy that the examiner never tried to explain how the Amano "camming shoe" could be considered to extend downward from the printhead. As the examiner well knows, every claim limitation must be given effect.

2. The examiner has incorrectly found that the tips 4 above holes 44 are tabs. (See paragraph 7 of the examiner's most recent office action). A hole, which is what Amano reference

character 44 denotes, is not a tab. A tab is a protrusion. A hole is the opposite. Consider the following dictionary definition of a tab (from www.m-w.com):

"1 a : a short projecting device: as (1) : a small flap or loop by which something may be grasped or pulled (2) : a projection from a card used as an aid in filing b : a small insert, addition, or remnant c : APPENDAGE, EXTENSION; especially : one of a series of small pendants forming a decorative border or edge of a garment d : a small auxiliary airfoil hinged to a control surface (as a trailing edge) to help stabilize an airplane in flight -- see AIRPLANE illustration"

Clearly, this definition, while broad, cannot be construed to cover a hole.

3. Even if the examiner does not agree with points with points 1 and 2 above, the claims are now amended to more clearly differentiate from Amano. As amended, it is clear that the protrusion *does not engage* the camming shoe. As the examiner must admit, Amano teaches a device where the protrusion 31 *does engage* the "camming shoe." This has patentable significance because an important aspect of the present invention is to teach a device that does not engage the camming shoe. Amano is therefore entirely unsatisfactory as a substitute for the claimed invention.

Finally, we acknowledge the examiner has raised certain objections, but these are all of trivial import compared to the prior art rejection and therefore respectfully request that they be deferred until there is a resolution of the prior art rejection.

It is submitted that the presently pending claims are neither taught nor suggested by the prior art, and a Notice of Allowability is believed proper.

Respectfully submitted,

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CLAIMS SHOWING REVISIONS

Claim 1 (amended). An ink printer cartridge for use in an ink printer having a printhead having an interior surface and a camming shoe extending downward from the interior surface, the camming shoe having a pressing means which includes a series of vertically oriented spaced tabs having clear spaces therebetween, the ink printer cartridge comprising:

a base and a lid attached to the base, the lid having at least one protrusion extending upward from the lid so that when the base is fully inserted within the printhead, the protrusion engages the printhead interior surface and no part of the protrusion, base, and/or lid engages the camming shoe.

Claim 4 (twice amended). The combination comprising: an ink printer printhead having an interior surface and a camming shoe extending downward from the interior surface, the camming shoe having a pressing means which includes a series of vertically oriented spaced tabs having clear spaces therebetween; and an ink printer cartridge having a base and a lid attached to the base, the lid having at least one protrusion extending upward from the lid so that when the base is fully inserted within the printhead, the protrusion engages the printhead interior surface and no part of the protrusion, base, and/or lid engages the camming shoe.

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